

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

Natasha Benton-Hill, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

The University of Rochester,

Defendant.

CASE NO. 6:23-cv-06447-FPG

Sabrina Harling, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

The University of Rochester,

Defendant.

CASE NO. 6:23-cv-06471

Dominic Fiacco individually and on behalf of all
others similarly situated,

Plaintiff,

v.

The University of Rochester,

Defendant.

CASE NO. 6:23-cv-06518

PLAINTIFFS' NOTICE OF UNOPPOSED MOTION TO CONSOLIDATE CASES

Pursuant to Federal Rule of Civil Procedure 42(a)(2) Natasha Benton-Hill, Sabrina Harling, and Dominic Fiacco (“Plaintiffs”), individually and on behalf of all others similarly situated, respectfully move for an order consolidating the above captioned matters *Benton-Hill v. The University of Rochester*, Case No. 6:23-cv-06447-FPG; *Harling v. The University of Rochester*, Case No. 6:23-cv-06471; and *Fiacco v. University of Rochester*, Case No. 6:23-cv-06518, and any subsequently filed or transferred actions relating to the Data Breach, under the docket number of the first filed case, *Benton-Hill v. The University of Rochester*, Case No. 6:23-cv-06447.

In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law. A proposed order is submitted herewith.

Prior to filing this Motion, Plaintiffs have conferred with counsel for Defendant who do not oppose the relief sought herein.

Dated: September 19, 2023

Respectfully submitted,

/s/ Randi Kassan
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Counsel for Plaintiffs and the Proposed Class

** to be admitted pro hac vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 19, 2023 the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

/s/ Randi Kassan

Randi Kassan